

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NORTH DAKOTA
WESTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	Criminal No. 1:18-CR-123
)	
vs.)	
)	DEFENDANT'S MOTION
KAYLA RENEE KEYES,)	FOR RECONSIDERATION
)	OF DETENTION
)	
Defendant.)	

COMES NOW the Defendant, Kayla Keyes, by and through her attorney, Ronald K. Hettich, Hettich Law Firm, PLLC, 112 University Drive N., Suite 323, Fargo, ND 58102, hereby moves this Honorable Court for an Order as follows:

1. Ms. Keyes recently appeared before the Court regarding the issue of detention.
2. The Court ordered Ms. Keyes to be detained while awaiting trial in this case.
3. However, the Court indicated that if Ms. Keyes could secure a spot in a treatment facility, the Court would entertain a motion for reconsideration.
4. Ms. Keyes has been accepted into the Florida Center for Recovery treatment program. Ms. Keyes would significantly benefit from intense in-patient treatment.
5. Other federal inmates have utilized this program in the past, so it is hopeful that the Court is aware of this very beneficial program. Ms. Keyes is fortunate to have been accepted.

6. The program is an intensive in-patient program that typically takes 60 days to complete. Participants are not allowed to leave the facility during treatment.
7. Ms. Keyes has insurance that will cover the cost.
8. The facility makes travels arrangements for participants.
9. Upon completion of the inpatient portion of the treatment program, Ms. Keyes would then move to the sober living portion of the program. This is similar to what is referred to as after care treatment.
10. The program provides bi-weekly updates on Ms. Keyes' progress. It is assumed additional progress reports could be made if needed or wanted by the Court or Pretrial Services Office. Ms. Keyes would sign a release of information to allow access to her progress.
11. Mr. Keyes is asking the Court to reconsider the issue of detention and allow her to attend the treatment program as outlined in the attached letter.

Dated this 19th day of June, 2020.

HETTICH LAW FIRM, PLLC

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